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CAMPAIGN FINANCE DIVISION

☒ WAIVER REQUEST
☐ RECONSIDERATION REQUEST

DATE: 7/22/2021

DOCKET #:

FILER INFORMATION

Name: Forum for Equality PAC
Office:
Parish:
Election Date: 11/3/2020
Level of Office: PAC

REPORT INFORMATION

Name of Report: 10-G
Original Due Date: 11/25/2020
Date Filed: 11/30/2020
Activity Receipts:
Expenditures:
Funds at Close of Reporting Period:

LATE FEE INFORMATION

Amount of Late Fee: \$1000
Days Late: 5
Late Fee Order Received: 3/3/2021
Payment/Waiver Request Due Date: 3/23/2021
Waiver Request Received: 3/17/2021
Additional Information Requested:
- Medical
- Financial
- Other

COMMENTS: K. Randall Evans, Treasurer for Forum for Equality PAC, As you can see from our filings over the past two decades, our PAC normally has very little money as they focus has been on education and advocacy. The vast majority of donations are made by our members to our 501(c)3 and 501 (c)4. As a result, he doesn't think they have ever needed to file a 10-day report, and had very little familiarity with it or some of the other reporting rules. This lack of familiarity is further demonstrated by the fact that he filed both a 40-day and annual report, only to be told since that was 95% duplicative that it was unnecessary.) That is not presented as an excuse, but rather as part of the explanation. He counted 10 days as landing on Thanksgiving, and rolling forward to Friday November 27. He worked on it that day, it was signed, and he believed placed in the mail that day. He now knows that it was not mailed until Monday November 30.

OTHER LATE FEE INFORMATION

Campaign Finance:

Other Outstanding Reports: No
Other Outstanding Late Fees: No
Prior Late Fees: Yes
Reassessed Late Fees: No

Disclosure Statements:

Other Outstanding Late Fees: No
Prior Late Fees: No

**Forum For Equality PAC
336 Lafayette Street
Suite 200
New Orleans, LA 70130**

March 12, 2021

Certified Mail No. 7017 3380 0000 6068 7787

Melissa Horn
Louisiana Board of Ethics
P.O. Box 4368
Baton Rouge, LA 70821

**Re: Forum for Equality PAC
Late fee assessment for November 3, 2020 Election
10-G Campaign Finance Disclosure Report filed 5 days late
REQUEST FOR WAIVER OF FINE**

Dear Melissa:

I am in receipt of your letter of February 26, 2021 regarding the late filing of a Campaign Finance Report by our organization. This letter is a request for a waiver of the \$1000 fine. First, I want you and the Board to know that Forum For Equality PAC takes the disclosure rules seriously and has always been supportive of the goals and letter of the law on Campaign Finance in Louisiana. We have always endeavored to file all reports timely as you can see from our past filings.

The failure to meet the deadline on the 10-day report is my personal fault, and I apologize for this mistake. As you can see from our filings over the past two decades, our PAC normally has very little money as Forum for Equality's focus has been on education and advocacy and therefore the vast majority of donations are made by our members to our 501(c)3 and 501(c)4. As a result, I don't think we have ever needed to file a 10-day report, and therefore had very little familiarity with it or some of the other reporting rules. (This lack of familiarity is further demonstrated by the fact that I filed both a 40-day report and annual report, only to be told that since that was 95% duplicative that it was unnecessary.) That is not presented as an excuse, but rather as part of the explanation of how this occurred.

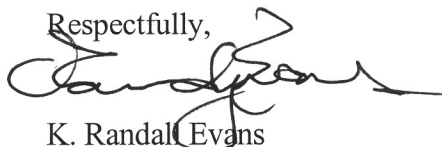
Not being as familiar with the rules as I should have been, I counted 10 days as landing on Thanksgiving, and therefore rolling forward to Friday November 27. Therefore, I worked on it that day, it was signed, and I believed placed in the mail that day. I now understand that it was not actually mailed until Monday November 30. The fault is entirely mine, but it was not intentional.

ETHICS BOARD REC'D
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Also, and while not an excuse, the late filing did not in any way subvert the objectives of requiring a 10-day report. I suggest that this is important in recognizing that there was no intent to hide anything. Our Fall 2020 PAC activity was primarily focused on defeating Orleans Parish School Board Member Leslie Ellison because of her numerous anti-LGBT positions and proposals over the years. She was keenly aware of this. Our hundreds of Anti-Ellison signs and thousands of pieces of mail had our name on it, and we had images of all of them on our website at ForumForEqualityPAC.com. Further, our PAC had already filed a lawsuit against her for stealing our Anti-Ellison campaign signs and in the week before the runoff, and a Civil District Court Judge issued a preliminary injunction against her and her campaign for removing or tampering with our signs. Additionally, our late filed ten-day report and the October 24, 2020 report showed the same contributors and types of expenditures, except for one additional \$80 new contributor. In short, there was no effort to hide our campaign activity, contributions, or expenditures. As such, the late filing was not an attempt to circumvent the goals of the 10-day report requirement but was simply a mistake.

As a result, I request that the \$1000 fine be waived, or at least substantially reduced. While the report was mistakenly filed late, there was no intent to do so or to circumvent the policy reasons for the report. Should you have any questions, please do not hesitate to contact me. Thank you.

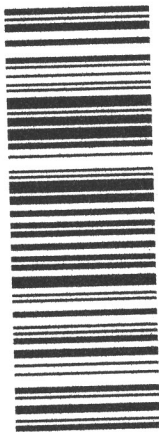
Respectfully,



K. Randall Evans
Treasurer
Forum For Equality PAC

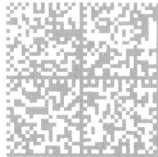
CERTIFIED MAIL

K. Randall Evans
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